

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ERIN WILSON, individually and on behalf of
others similarly situated,

Plaintiff,

v.

COOKUNITY LLC,

Defendant.

Case No. 1:25-cv-03237-TRJ

DECLARATION OF ERIN WILSON

1. My name is Erin Wilson. I am over 18 years old. I can testify competently to the undersigned statements.
2. This declaration is based on my personal knowledge.
3. My telephone number (404) XXX-XXXX is on the National Do-Not-Call Registry.
4. I am the user of (404) XXX-XXXX.
5. I am the owner of (404) XXX-XXXX.
6. I pay the bill for (404) XXX-XXXX.
7. This number is used for personal, household purposes.
8. I never provided my consent to CookUnity Inc. to make calls to (404) XXX-XXXX. I did not know the company existed before they began contacting me.
9. I reviewed my internet history for March 28th, 2025 for visits to the website cookunity.com. I do not have any record of visiting that website.

10. Indeed, I have approximately 422 websites visited that day, and none of them were cookunity.com.

11. Indeed, I understand that CookUnity claims that an individual named Pulin Sheth made such a request.

12. I do not know Pulin Sheth and certainly did not instruct her to visit any website on my behalf.

13. I understand from CookUnity's brief that one of the steps to sign up for their service is to "create an account or proceed through an existing account with CookUnity, Google, Facebook, or Apple."

14. I did not and have never created an account with CookUnity.

15. I understand that CookUnity claims that someone opted in via Facebook Mobile browser.

16. I have reviewed my Facebook login history for March 28th, 2025. I was not logged in to my Facebook at that time, and had not been logged into my Facebook account since October 19th, 2024.

17. Indeed, none of the information captured by CookUnity during the sign-up session is mine. Thus, I did not submit to any arbitration clause.

18. I do not and have never welcomed nor wanted illegal calls and do nothing to receive or deserve them. My injury was done completely at the hands of Defendant, who took it upon itself to call me in violation of the TCPA.

19. I was harmed by the Defendant's calls and text messages. Illegal calls are frustrating, obnoxious, and annoying. They are a nuisance and disturbed my solitude.

20. Since changing my number to (404) XXX-XXXX, I have endured a barrage of illegal calls from telemarketers.

21. This is invasive since I have never provided my number to these companies. I take great care to shield my personal information for privacy's sake. I do not supply my number rashly.

22. As the current owner of 404-XXX-XXXX, I have repeatedly been incorrectly addressed as 'Ninapulin', 'Sheth', 'Shethfamily', or 'Ninapulin Sheth' by various telemarketers. Now, in this action, a person named 'Pulin Sheth' apparently signed up for CookUnity's services.

23. At some point earlier this year, I decided to Google Ninapulin Sheth to determine if she was a real person who may have previously had my number, as I was getting many unsolicited marketing calls directed to her.

24. She does exist, and she has a Facebook account. Indeed, in this action, CookUnity's evidence shows that someone accessed their form via Facebook Mobile browser.

25. I have never proactively created or found TCPA claims nor entrapped businesses. I do not welcome nor invite these illegal calls and have taken measures for them to stop, including by placing my number on the Do-Not-Call Registry and holding those who call me accountable for their actions.

26. I brought this case as a class action because I know that there are likely thousands more people in a similar situation such as myself, having received calls from Defendant without their consent.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of September, 2025.

A handwritten signature in black ink that reads "Erin Wilson". The signature is written in a cursive, flowing style. The first name "Erin" is written with a large, looped 'E' and a small 'i'. The last name "Wilson" is written with a large 'W' and a small 'i'.

Erin Wilson